

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE YOUNG,

Plaintiff

v.

Civil Case No. 1:23cv00445-PTG-JFA

**WASHINGTON GAS LIGHT
COMPANY, *et al.***

Defendants

**DEFENDANT WASHINGTON GAS LIGHT COMPANY'S OBJECTIONS TO
PLAINTIFF'S PROPOSED EXHIBITS**

Defendant Washington Gas Light Company (Washington Gas) through undersigned counsel and pursuant to Fed. R. Civ. P. 26 (a) (3) and this Court's October 6, 2023 Order (Dkt. 22) hereby submits the following objections to Plaintiff's Proposed Trial Exhibits (Dkt. 46).

Overall Objections: Washington Gas objects to Plaintiff's exhibits to the extent they identify partial documents rather than the documents in their entirety as produced in discovery. Washington Gas objects to any and all argumentative, testimonial or misleading descriptions of contents of exhibits as stated in Plaintiff's list of exhibits. Washington Gas will move to strike such descriptions from any exhibit list provided to the jury or other fact finder in this matter.

Exhibit No	Bates No	Description of Document	Date	Objection
1	TS_000001	Dunn email to Temporary Solutions (TS) saying that Robb has spoken to staff about return to work	5/6/2020	Objection to argumentative and misleading description

Exhibit No	Bates No	Description of Document	Date	Objection
2	TS_05-6	TS HR states that Young's June 2020 email about Robb has been escalated to HR for review and investigation	6/15/2020	Designates an incomplete document
3	TS_008	TS interview notice for Young	6/19/2020	Designates an incomplete document
4	TS_10-11	WA Gas and TS Placement Agreement		None
5	TS_23	Email from Young to TS about discrimination at the workplace from Robb. Young also states that she is shocked to learn that she is not returning	6/12/2020	Objection to argumentative and misleading description
6	TS_24	Dunn states that Young has been doing a commendable job	4/2/2019	Objection to argumentative description; incomplete document
7	TS_28	Employees who replaced Young and Thomas are in yellow		Objection to argumentative description
8	TS_32-34	Tyrita Thomas' email and letter to HR about Robb's complaints. It also states that Robb will be having a discussion with Dunn about employee returning	6/11/2020	Objection to argumentative and misleading description
9	TS_35-38	Young letter to HR about her concerns with Robb	6/11/2020	Objection to argumentative description
10	TS_43-53	TS interview notice to Young.	6/18/2020	Designates an incomplete document
11	TS_55-60	TS EEO interviews with coworkers.	June – Aug 2020	None
12	TS_61	Young note to Robb about positive energy at the workplace.	unknown	Objection to argumentative and

Exhibit No	Bates No	Description of Document	Date	Objection
				misleading description
13	TS_70-71	Dunn email to TS that they are bringing people on board June 2020. Also states that he and Robb want to interview candidates	5/21/2020	Objection to argumentative description
14	TS_73-88	WGL & TS Temp Contract		None
15	TS_94-102	TS response to US EEOC	9/4/2020	None
16	TS_107-128	TS EEO Handbook		None
17	TS_129-131	Young W2	2017-2020	Designates an incomplete document
18	TS_132-136	Young TS/WG Payroll Hours	2018-2020	Document is at TS_133-136
19	TS_199	Young email to Drain that she wants to raise complaints about workplace.	3/16/2020	Objection to argumentative description
20	TS_140	Dunn email to TS that operations are suspended	3/18/2020	Designates an incomplete document
21	TS_202-204	Hourly Sheets	Jan – March 2020	None
22	WGL_000001-2	Robb Statement to US EEOC. Denies making HWE comments. But his reprimand letter says that he did engage in HWE.	9/4/2020	Objection to argumentative and misleading description
23	WGL_3-6	Offer letter to Thomas Robb & resume. He went to Fresno Pacific University	10/8/2019	Objection to argumentative misleading description; exhibit includes two separate documents
24	WGL_9-22	Robb 2020 evaluation.	2020	None

Exhibit No	Bates No	Description of Document	Date	Objection
25	WGL_23-34	Robb 2021 Evaluation	2021	None
26	WGL_35	Robb Resignation letter	3/15/2022	Designates an incomplete document
27	WGL_39-54	WG-TS Contract		Objection - relevance
28	WGL_61-62	Dunn EEOC Affidavit.	9/4/2020	Erroneous designation – Exhibit is at WGL_55-56
29	WGL_57-60	EEO Policy	April 2020	Erroneous designation; range includes two documents
30	WGL_63-136	WG 2022 Financial Report		Objection - relevance
31	WGL_137-140	Young HWE Report to WGL	6/11/2020	Objection to argumentative description; duplicative
32	WGL_141-143	Proctoring Job Description		None
33	WGL_148	Dunn email to TS about shutting down operations at WG	3/18/2020	Designates an incomplete document; duplicative
34	WGL_150	Dunn Email to TS that Young and Thomas not returning	5/22/2020	Objection to argumentative and misleading description; Designates an incomplete document
35	WGL_152-154	EEO Policy	March 2020	None
36	WGL_155	Org Chart		None

Exhibit No	Bates No	Description of Document	Date	Objection
37	WGL_166	Shows that Robb was terminated and EEO policies signed by Robb		Objection to argumentative and misleading description
38	WGL_167-192	Position Statement to US EEOC	9/9/2020	Designates an incomplete document
39	WGL_193	Robb and Dunn to interview candidates	5/21/2020	Designates an incomplete document; Objection to argumentative and misleading description
40	WGL_222	Robb asks Young if she is getting behind on schedule.	3/5/2020	Objection to argumentative and misleading description; designates an incomplete document
41	WGL_226-231	227: WG Internal Summary showed that Robb engaged in “race, age and politics” discussions that WG deemed inappropriate.	2020	Objection to argumentative and misleading description
42	WGL_234-235	“No reason” given for Deirdre not returning to work	unknown	Objection to argumentative and misleading description
43	WGL_242-243	WGL Disciplinary Warning to Robb about HWE against Young	10/30/2020	Objection to argumentative and misleading description

Exhibit No	Bates No	Description of Document	Date	Objection
44	Young-004	Email with Young about pay increase	6/28/2018	Designates and incomplete document
45	Young-10 to 13	Robb email to staff about time cards and schedule	1/3/2020	Objection to argumentative description
46	Young-14 to 15	Young emails with Robb about change of duties and instructions	3/6/2020	Objection to argumentative and misleading descriptions
47	Young-017 to 019	Young email to Holly Anzano regarding pay raise	March – April 2019	Objection to argumentative description
48	Young-020 to 34	Young job applications	2019-2022	Objection to misleading and inaccurate description
49	Young-034 to 37	Young applications for unemployment with Virginia	2020-2021	None
50	Young-038	DC unemployment application	2023	None

Dated: March 4, 2024

Respectfully submitted,

STINSON LLP

By: /s/Grant E. Mulkey

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Washington Gas Light Company

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, I caused to be filed Defendant Washington Gas Light Company's Objections to Plaintiff's Proposed Trial Exhibits using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

DATED: March 4, 2024

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